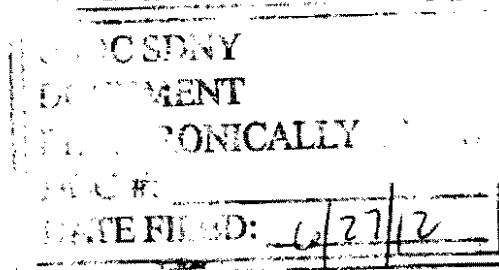


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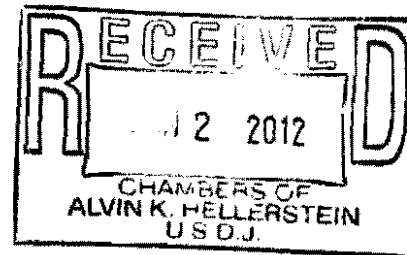
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June 27, 2012

VIA E-MAIL AND FACSIMILE

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1050
New York, New York 10001



Re: In re September 11 Litigation, 21 MC 101 (AKH)
World Trade Center Properties LLC et al. v. American Airlines, Inc., et al., 08 Civ. 3722
C & F Ref.: DTB/CRC/VAT/28507

Dear Judge Hellerstein:

I write on behalf of the Aviation Defendants and plaintiff 7 World Trade Company, L.P. ("7 World Trade Co.") to request the Court's permission to file under seal all motion papers filed in conjunction with the Aviation Defendants' motion for summary judgment dismissing 7 World Trade Co.'s claims for World Trade Center Building 7 ("WTC 7"). Under the briefing schedule directed by the Court, the Aviation Defendants are to file their moving papers by this Friday, June 29, 2012; 7 World Trade Co. is to file its opposition papers by August 17, 2012; and the Aviation Defendants are to file their reply papers by August 31, 2012.

The Aviation Defendants and 7 World Trade Co. request that these motion papers be filed under seal because they will contain materials that have been designated as confidential by 7 World Trade Co. and its insurer, Industrial Risk Insurers ("IRI"), pursuant to the Court's January 4, 2004, March 30, 2004 and August 12, 2005 Confidentiality Protective Orders (copies of which are enclosed) or are confidential pursuant to the settlement agreement recently entered into by 7 World Trade Co. and IRI. The briefs also will contain arguments and statements addressing those materials, including a vast amount of proprietary and otherwise sensitive private financial information relating to 7 World Trade Co.'s and IRI's businesses that 7 World Trade Co. and IRI have designated as confidential. The parties do not anticipate that the motion papers will contain any materials that have been designated as confidential by American.

It would be extremely burdensome and time-consuming for the parties and IRI (a non-party) to prepare for public filing redacted versions of all motion papers while briefing the Aviation Defendants' motion and while the precise exhibits and contents of the submissions remain in flux. Consistent with how some previous submissions have been handled, the parties then will

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Honorable Alvin K. Hellerstein

June 27, 2012

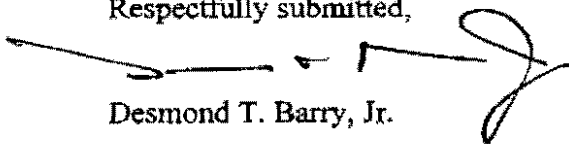
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work together to prepare an agreed-upon complete set of all motion papers for public filing once the motion is fully briefed.

Accordingly, the Aviation Defendants and 7 World Trade Co. respectfully request that the Court direct the Clerk of the Court to accept all motion papers filed in conjunction with the Aviation Defendants' motion for summary judgment dismissing 7 World Trade Co.'s claim for WTC 7 for filing under seal by endorsing this letter as set forth below.

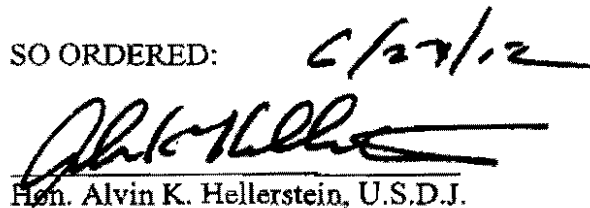
Please do not hesitate to contact me should you have any questions.

Respectfully submitted,



Desmond T. Barry, Jr.

SO ORDERED:



Hon. Alvin K. Hellerstein, U.S.D.J.

cc: Via Email
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Honorable Alvin K. Hellerstein

June 27, 2012

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